

COVINGTON

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By Electronic Mail

May 22, 2020

Anne McGinness Kears
Temitope O. Leyimu
Motley Rice LLC
28 Bridgeside Boulevard
Mount Pleasant, SC 29464

All Plaintiffs' Counsel
mdl2804discovery@motleyrice.com

Re: Deposition Requests

Dear Counsel:

We write on behalf of all defendants concerning depositions of the City of Huntington witnesses. Defendants request deposition dates for the following party fact witnesses:

1. Scott Arthur, Budget Director, Huntington
2. Mark A. Bates, Council Member, City Council
3. Darla Bentley, Former Budget Director, Huntington
4. Ray Canafax, Deputy Chief, Huntington Fire Department
5. Pamela Chandler, Former Finance Director, Huntington
6. Hank Dial, Chief, Huntington Police Department
7. Carl Eastham, Former Chief, Huntington Fire Department
8. Rebecca Howe, Council Member, City Council
9. Paul Hunter, Sergeant, Huntington Police Department; Drug and Violent Crimes Task Force; Head of City Law Enforcement Narcotics Unit
10. Jim Johnson, Former Police Chief, Huntington Police Department; Director, Mayor's Office of Drug Control Policy
11. Rocky Johnson, Captain, Huntington Police Department, former Head of City Law Enforcement Narcotics Unit

COVINGTON

Anne McGinness Kearse
All Plaintiffs' Counsel
May 22, 2020
Page 2

12. Scott Lemley, Director, Huntington Planning and Development; Former Member, Mayor's Office of Drug Control Policy
13. Paul Matovich, Corporal, Huntington Police Department; Huntington Violent Crime and Drug / FBI Task Force; DEA Heroin Task Force
14. Craig Preece, Detective, Huntington Police Department; DEA Heroin Task Force
15. Jan Rader, Fire Chief, Huntington Fire Department
16. Deron Runyon, Former Finance Director, Huntington
17. Dan Underwood, Captain, Huntington Police Department
18. Steve Williams, Mayor, City of Huntington
19. Kim Wolfe, Former Mayor, City of Huntington; Former Sheriff, Cabell County Sheriff's Office¹

In the case that the City of Huntington takes the position that any of the foregoing witnesses is not under Huntington's control for purposes of depositions, please advise defendants by Wednesday, May 27.

Defendants request that Huntington prioritize the production of any remaining custodial files (and any other department or other noncustodial files that will be relevant to a particular deposition) for the individuals requested for deposition. Such documents should be produced at least 14 calendar days before each witness's deposition, and deposition dates should be set with that in mind. Defendants reserve the right to request additional party fact witnesses as identified based on further discovery.

We would appreciate and look forward to your prompt response.

Sincerely,

/s/ Laura Flahive Wu

Laura Flahive Wu

cc: All Defendants' Counsel

¹ Kim Wolfe is also a witness for Cabell County.